

August 10, 2000

The Honorable Rosalyn Millman
Deputy Administrator
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington D.C. 20590

Subject: Petition for Interpretation or Clarification, FMVSS208, Occupant Crash Protection Docket No. NHTSA-00-7013, Notice 1

Dear Ms. Millman:

This submission by Autoliv is for the purpose of clarifying some of the test procedures and other requirements that have surfaced in development of systems to meet the new rule.

S24.4.2 Position 1 (chest on instrument panel) describes a procedure for positioning the chest of a 6-year-old child test dummy against the passenger air bag module located in the instrument panel. In some cases when this procedure is followed, the dummy's head will contact the windshield first and the vehicle's seat may not allow the dummy to be lowered so that the chest contacts the IP. This can result in a gap between the IP and chest when the head is touching the windshield and therefore makes this a less severe test condition than the one presented in the SNPRM. For this situation we are requesting a clarification on how to properly position the dummy for this test condition.

In S24.4.3 Position 2 (head on instrument panel), the sequence of steps to position the dummy appears to be completed when "any part of the dummy contacts the vehicle's instrument panel" (see S24.4.3.4). In some cases the knees may be the first surface of the dummy to contact the IP and therefore leave the dummy's head some distance away from the instrument panel and air bag modules. This makes the test easier than the one described in the SNPRM which places the head on the IP and produces a worst case position for the low risk deployment option. It would appear that this condition should be the intent of the final rule and therefore we request an interpretation of this positioning procedure.

Another issue with this section is the appropriate position of the dummy when the passenger module is not located directly in front of the passenger's seating position. The instructions in the rule call for the dummy's midsagittal plane to be coincident with the Plane D which is through the "geometric center of the right front air bag tear seam". There are possible module locations where Plane D would be offset by a substantial distance from the dummy's position on the seat and therefore would not permit compliance with this requirement. We request an interpretation of the positioning instructions for the situation where the right front air bag module is located in the instrument panel away from the longitudinal centerline of the right front passenger" seating position.

We respectfully submit this request for NHTSA's consideration and should there be any questions concerning this submission please contact Mr. Richard Carr at 801-629-9125 or myself at 801-629-9202.

Sincerely,



David P. Dahle
Director Module Engineering and Regulatory Affairs